

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

VICKI TIMPA, INDIVIDUALLY,  
AND AS REPRESENTATIVE OF  
THE ESTATE OF ANTHONY  
TIMPA et al.,  
Plaintiffs,

v.

DUSTIN DILLARD et al.,  
Defendants.

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Civil Action No. 3:16-CV-3089-N

**DEFENDANTS DILLARD, VASQUEZ, AND MANSELL’S UNOPPOSED  
MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

TO THE HONORABLE COURT:

Defendants Dustin Dillard (“Dillard”), Danny Vasquez (“Vasquez”), and Kevin Mansell (“Mansell”) (collectively, “Defendants”) file this unopposed motion for withdrawal and substitution of counsel, and respectfully show the following.

1. Tatia R. Wilson of the Dallas City Attorney’s Office hereby enters her appearance as lead counsel of record for Defendants Dillard, Vasquez, and Mansell.

2. Defendant Dillard requests that his current counsel of record, Edwin P. Voss, Jr. of Brown & Hofmeister, L.L.P., be permitted to withdraw as counsel of record for Defendant Dillard.

3. Defendant Vasquez requests that his current counsel of record, Gerald Bright and David L. Craft of Walker Bright, P.C., be permitted to withdraw as counsel of record for Defendant Vasquez.

4. Defendant Mansell requests that his current counsel of record, Mark E. Goldstucker of the Law Office of Mark E. Goldstucker, be permitted to withdraw as counsel of record for Defendant Mansell.

5. Defendants' requests for withdrawal and substitution are not sought for delay only. Defendants Dillard, Vasquez, and Mansell approve the withdrawal and substitution and ask the Court to honor their requests.

6. As shown by the Certificate of Conference, below, Plaintiffs and Intervenor do not oppose this motion.

WHEREFORE, Defendants Dustin Dillard, Danny Vasquez, and Kevin Mansell pray that the Court grant this motion and enter an order directing the Clerk of the Court to enter the appearance of Tatia R. Wilson as lead counsel of record for Defendants Dillard, Vasquez, and Mansell, and remove Edwin P. Voss, Jr. as counsel for Defendant Dillard, Gerald Bright and David L. Craft as counsel for Defendant Vasquez, and Mark E. Goldstucker as counsel for Defendant Mansell.

Respectfully submitted,

By: /s/ Edwin P. Voss, Jr. [w/permission]

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BY: /s/ Gerald Bright [w/permission]

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s/ Mark E. Goldstucker[w/permission]

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*Attorneys for Defendants Dustin Dillard, Danny Vasquez, Kevin Mansell, Raymond Dominguez, and Domingo Rivera*

**CERTIFICATE OF CONFERENCE**

I certify that on May 10, 2019, I conferred via email with Geoff Henley, counsel for Plaintiffs, and Susan Hutchinson, counsel for Intervenor, regarding the relief sought by this motion. Neither Plaintiffs nor the Intervenor oppose this motion or the relief sought therein.

s/ Tatia R. Wilson

Assistant City Attorney

**CERTIFICATE OF SERVICE**

I certify that on May 21, 2019, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the CM/ECF electronic case filing system of the court. The electronic case filing system will send a “Notice of Electronic Filing” notification to all case participants registered for electronic notice, including all *pro se* parties and/or attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I further certify that I have served to the extent applicable all case participants not registered for electronic notice by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

s/ *Tatia R. Wilson*

Assistant City Attorney